



UNITED FISHERMEN OF ALASKA

received
10/27/03

October 27, 2003

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Vinsel

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 4034
Alexandria, VA 22302

RE: Comments on USDA Proposed Food Guide Pyramid

Dear Food Guide Pyramid Reassessment Team members,

United Fishermen of Alaska offers the following comments on the USDA's proposed updated food guide pyramid:

1. We request that you specifically mention FISH in Table 1. The category heading should read "Meat, Fish, and Beans" instead of the current "Meat and Beans".
2. In the *Notes for Table 1*, page 2, we request that you mention fish as a healthy source of protein. According to Walter C. Willet, M.D. of Harvard Medical School in *Eat, Drink, and Be Healthy* (p.23), "...the best sources of protein are beans and nuts, along with fish, poultry, and eggs." Language to this effect would be beneficial to the health of those using the new pyramid for dietary guidelines.
3. In the *Notes for Table 1*, page 4, item 5, *Explanation of "additional fats"*, we suggest that you include mention of the health benefits of fish oils as a primary source of essential n-3 fatty acids. According to Walter C. Willet, M.D. of Harvard Medical School in *Eat, Drink, and Be Healthy* (p.75):
"One class of polyunsaturated fatty acid deserves individual attention even though it makes up only a minority of the fats in our diet. These are the n-3 fatty acids (also called the omega-3 fatty acids). They are *essential* fats, meaning ones that your body can't make from scratch or from rearranging other fats, and they are needed for normal functions. You have to get n-3 fatty acids from food, mainly fish...
...(n-3 fats) have been shown to have benefits in the prevention or treatment of heart disease and stroke and possibly autoimmune problems such as lupus, eczema, and rheumatoid arthritis; and a variety of other conditions"

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Vinsel

We appreciate your undertaking this work for the health benefit of all Americans, and hope you find our suggestions helpful.

United Fishermen of Alaska represents 34 Alaska commercial fishing organizations and hundreds of independent individual fishermen, altogether representing over 10,000 Alaska commercial fishermen.

Sincerely,



Mark D. Vinsel
Executive Director

106 Snyder Fu Buraker
DATE:

27 October 2003

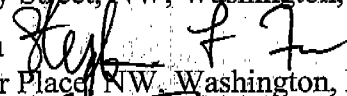
RECEIVED
10/27/03
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TO:

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexander, VA 22302

FROM:

Dan Snyder 
3411 Ordway Street, NW, Washington, DC 20016

Stephenie Fu 
2228 Decatur Place, NW, Washington, DC 20008

Ken Buraker 
3235 Walbridge Place, NW, Washington, DC 20010

RE:

Revisions to the Food Guide Pyramid

The following comments and the accompanying pyramid graphic represent our personal opinions and not those of our employer or our clients.

We are writing not as scientists, but as communicators who specialize in nutrition and reaching health professionals and the public. Our combined experiences include the Hassle-Free Guide to a Better Diet (1979), Dietary Guidelines (1980), the Food Wheel (photographic version), Project Lean, The Food Guide Pyramid (1991), the National 5 A Day for Better Health Program (1991 to present), nutrition and physical activity-oriented web sites for the National Cancer Institute's 5 A Day program (www.9aday.cancer.gov), the National Bone Health Campaign web site for the *Powerful Bones. Powerful Girls.* program (www.powerfulbones.com), and the Centers for Disease Control and Prevention kids health web site (www.bam.gov).

We appreciate the opportunity to respond, and congratulate the Center on a process that is transparent, as well as a web site that is a thorough and valuable reference tool for communicators, researchers and the interested public.

Updating the Food Guide Pyramid: Key Proposals

Build on the Pyramid's brand equity

- Make changes evolutionary rather than revolutionary. *Most Americans recognize the pyramid "brand" as a healthful guide. Introducing a new symbol would add to their confusion and their ongoing frustrations with changes in dietary recommendations.*
- An updated pyramid will send the consumer a message of refinement and growth... *rather than a confusing message of discard and abandonment that a new symbol will create*
- A new symbol is not needed to generate publicity and awareness. *The pyramid was built on controversy and it will continue to generate heated discussions and the media attention that will be required to efficiently convey the recommendation to the public*

Focus the Pyramid on obesity

- Help consumers make healthful food choices by emphasizing and promoting the nutrient-dense foods in all food groups... *perhaps create a new term for these nutrient-rich sources, like "power calories"*
- Identify foods that should be consumed less frequently (i.e., less nutrient dense), but can still fit in a healthful diet. *Even the most health-conscious consumer places a high value on taste...the recommendations should include "enjoy..."*
- Emphasize the positive attributes of foods in addition to their negative ones. *While consumers frequently makes food choices based on what is **not** in food...low calorie, fat-free, low-sodium, no cholesterol... they are increasingly interested in what **is** in food...give them the perspective of the positive attributes of the food, or an understanding of the value of some fats.*

...And focus on food

- Include physical activity with caution. *The pyramid is a guide to help consumers make healthy food choices, an increasingly complicated challenge. The addition of physical activity would add further challenges, take the emphasis away from food and, ultimately, weaken the symbol's impact. Supporting text should talk about the importance of physical activity and the amount required to burn meaningful quantities of calories. Physical activity is obviously important to overall health and it should have it own exclusive, focused national program.*

396 Fu Snyder Buraker

Create customized pyramids

- Replace a "one size fits all" approach with "my" pyramid... *use an interactive web site to help users create personal pyramids based on their ideal weight, age, sex, health status including BMI, health-related habits, family health histories, culture and food preferences...the more data and preferences the user enters the more specific and relevant their personal pyramid would become*
- Demonstrate how users can incorporate food they love or "cannot live without" into a healthful diet. *An interactive site would involve the user and would illustrate how to balance daily intake*

Revise serving sizes

- Create new serving sizes for the Bread, Cereal, Rice and Pasta Group. *The serving sizes of the revised recommendations must be consistent with the Nutrition Fact labels. Nutrition Insights #22, December 2000 carefully outlines the reasons for the differences between the Pyramid's and Nutrition Fact's definitions of serving sizes. However, the explanation completely ignores the communication-related confusion that has resulted from the conflicting definitions. The Insight explanation, two pages in length, is MUCH too complicated for consumers (and probably most health professionals). Most importantly, the conflicting definitions create user frustration and "tune-out" — which defeats the whole purpose at a time when portion size is an issue of growing prominence in the battle against obesity.*
- Serving sizes must pass the "laugh test." *A serving of a ½ cup of pasta or ½ cup of cereal, regardless of sound science reasoning, does not pass the test. The pyramid should be a simple, impactful and memorable communication device, not an article one would expect to see in a scientific journal.*

Let history be our guide

- Listen to the target audiences. *The participants of the initial focus groups (conducted in 1998 as part of the formative evaluation process of the food guide) were frequently surprised at the large number of recommended servings in the Bread and Cereal Group...6 to 11 serving per day. The surprise was probably due not to the aggregate quantity of the 6 to 11 servings, but rather to the unrealistically small serving size definition that had the effect of overstating the recommendations for this group. By "simply" changing the definition of a serving to one cup of pasta or cereal and two slices of bread...the recommendation would have changed to 3 to 6 servings...and would now be more consistent with the Nutrition Fact labels.*

4/27/06 Fu Buraker Snyder

Pyramid hindsight

In the design process, the pyramid graphic stacked the food groups relative to their number of recommended serving...the Bread and Cereal Group, with the largest number of servings consequently became the pyramid base.

IF the serving sizes had been realistic ...1 cup of pasta or cereal, two slices of bread...The Fruit and Vegetable Groups would have become the base of the pyramid since it would then have the largest number of recommended servings (5 to 9), and the Bread/Cereal Group (revised to 3 to 6 servings) or the combination of The Milk Group (2 to 3 servings) and the Meat Group (2 to 3 servings) would have been placed on top of the base group.

The resulting pyramid graphic would have communicated a very different message to the consumer...that our diet should be build on a foundation of fruits and vegetables...rather than breads, cereals and pastas. Research continues to support the value of fruits and vegetables, including a most recent Penn State study showing that people who simply started their meal with the addition of a salad consumed fewer calories over the course of the day.

Refining the Food Guide Pyramid

The following graphic is an illustration of how the pyramid might be revised to help consumers make more healthful food choices from all food groups. The horizontal food group bands are rotated to become bands that radiate from the top of the pyramid to the base, communicating:

- **There are healthful choices in all food groups.** *All food groups are now part of the pyramid base, indicating that consumers can enjoy choices from all food groups. The widths of the food groups' bands reflect the recommended proportion of that group in the total diet.*
- **Eat more foods with "power calories."** *The food group bands become narrower as they move to the apex, indicating that one should eat less of these "less nutrient-dense" foods, and more of the "nutrient-dense" foods at or near the base.*
- **Not all fats are created equal.** *A new band has been added for fats and oils to provide assistance in selecting healthy fat and oil choices.*

696 Snyder Fu Buraker

For example, using the existing food groups (food placement within the bands would be determined by a nutrient density scale that would be "invisible" to the consumer) and adding a new band for fats and oils, the visuals might look like this:

- **Vegetable Group**/at the base of the band would be foods like broccoli and greens; at the top of the band would be French fries
- **Fruit Group**/at the base foods would be foods like strawberries and kiwis; at the apex, fruit jams and pies
- **Milk Group**/non-fat milk and yogurts would be at the base; cream and ice cream at the apex
- **Meat & Poultry Group**/nuts, beans, skinless chicken breasts, lean cuts of meat and eggs at or near the base; fried foods like corn dogs at the top
- **Grain and Group**/whole grain products at the base; cakes and doughnuts at the top.
- **Fat and Oil Band**/oils like olive and canola at the base; lard at the top

The new pyramid's overall graphic message is to build a healthful diet from the nutrient-dense food choices at or near the base of the pyramid...the home of the "power calories"...and to enjoy the foods at or near the top pyramid occasionally

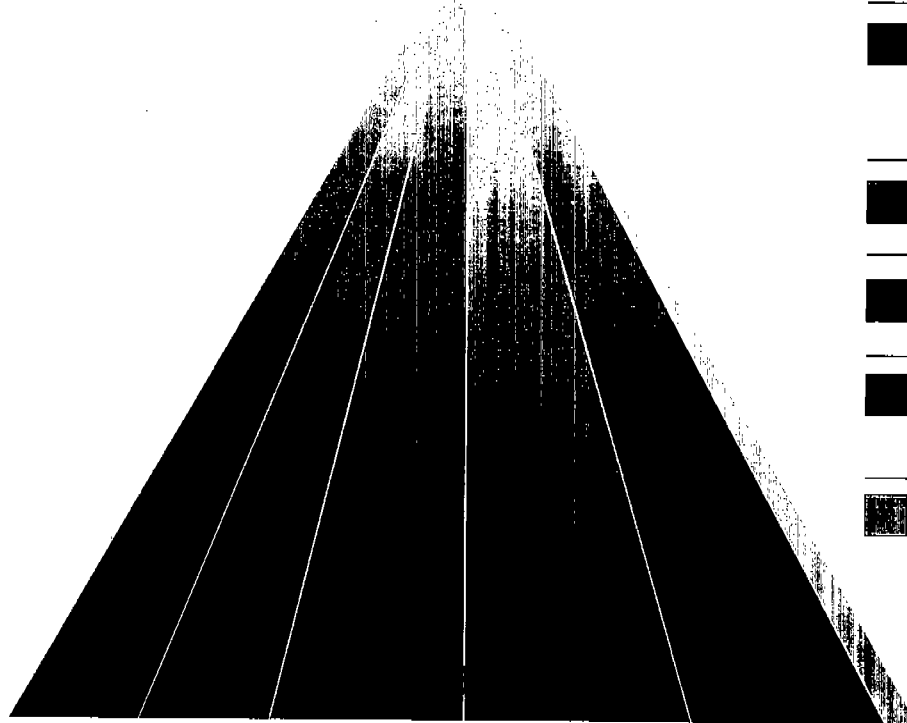
When the pyramid is illustrated in large sizes, food visuals would be added to vertical bands. When the size of the pyramid is reduced, the Food Group bands would be defined by color only, with the colors becoming lighter (less dense) as they move upward to the apex.

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CONCEPT FOR PYRAMID REVISION

The Radiant Pyramid

Sparingly



KEY

- Milk, Yogurt & Cheese Group
2-3 Servings
- Meat, Poultry, Fish, Dry Beans, Eggs & Nuts Group
2-3 Servings
- Fruit Group
2-4 Servings
- Vegetable Group
3-5 Servings
- Bread, Cereal, Rice & Pasta Group
3-5 Servings
- Fats & Oils

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STATE OF NEW YORK DEPARTMENT OF HEALTH

Riverview Center

received
10/27/03

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October 22, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

Dear Sir or Madam:

Thank you for the opportunity to provide comments on the proposed revisions to the daily food intake patterns that serve as the technical basis for the Food Guide Pyramid. As Director of the Division of Nutrition, New York State Department of Health, I would like to submit the following comments:

- The nutritional goals for the proposed daily food intake patterns are appropriate for professional use. The important issue is that these goals be communicated in language that people will understand. If foods that are high in desired nutrients are given the most emphasis, the message that they are contributors to a more healthful diet will come across.
- The proposed daily food intake patterns are appropriate for educating Americans about a healthful diet. The increased amounts of whole grains, dark-green leafy vegetables, legumes and fruits are consistent with chronic disease prevention. The translation of these food intake patterns to Americans is critical. Emphasis should be on low-fat choices in each food group.
- The labeling of each food group should be considered part of the education on healthful eating. With that in mind, we would recommend that the names of the food groups be more nutrient-based (e.g. Protein-Rich Foods Group, Calcium-Rich Foods Group, etc.). The labels "additional fats" and "added sugars" may be misleading in that consumers may feel they should be added to achieve a healthful diet.
- We recommend the use of cups and ounces, rather than "servings" to suggest daily amounts from each food group. There is tremendous confusion between "serving" and "portion." When cups or ounces are not appropriate, portion sizes should be related to common object sizes, such as the palm of a hand or deck of cards.

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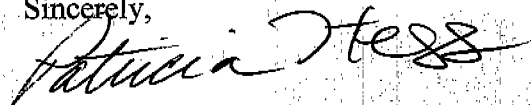
Consumer materials should be focused on balance and variety with special focus to the extreme demands on the best food choices in times of growth (childhood and pregnancy.). Specific recommendations for consumer materials include:

- A separate Food Guide Pyramid for children.
 - Pictures of foods used in consumer materials should represent recommended portion sizes.
 - Fats and oils, and sweets should be separated into two groups.
 - Include some reference to trans fats in the fats and oils groups to reflect new labeling requirements.
 - There should be clear communication that the range of number of servings is based on age, gender, and physical activity level.
- When looking at Table 2 and Table 3 there are three distinct calorie levels that become apparent within a 600 calorie range determination:
 - Level 1 – Children 2-8 = 1000-1600 calories
 - Level 2 – All females and older Americans (>50) = 1600 – 2200 calories
 - Level 3 – Males 14-50 = 2200 – 2800 calories

These three levels could be subsets of the food patterns for developing consumer materials.

Meeting the dietary needs of Americans is clearly a challenge. With the rise in obesity in all age groups we must strive to shift the current eating and physical activity patterns contributing to this rise. We appreciate the opportunity to contribute to this process and anxiously await the final product.

Sincerely,



Patricia A. Hess, Director
Division of Nutrition

Marianne Izuka

received
10/27/03

KT

10/26/03
October 26, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Concerned Nutrition Team;

Thank for the opportunity to give public opinion on the Food Pyramid. I am a Nutrition Education Student at Eastern University. I will be a Health Educator in Pennsylvania upon graduation from my master's program in School Health Services.

As you are aware, children and adolescence are moving away from the Healthy People 2010 goals to decrease health disparities and reduce the number of over weight children to actually have an increase in the number of children and adolescence that are overweight. In the inner city school where I am doing a nutrition project, at least 25% of the girls are overweight.

This indicates the need for your updating. Thank for your concern. Here are some of my comments based on what I have been learning:

The recommended daily in take of water is not listed in any table. Water is one of the most important substance our body needs and is often overlooked. Water should be included in the pyramid and in value tables. Also active men and women need more water. Other pyramids incorporate water, will it be a component worked into the tables and pyramid?

Table three is clearly well researched and thorough. It is good to see fiber worked in. Food patterns are expanded for active men, but what about active women? This is not clear if it is in the table.

America is a melting pot of cultures, in the theoretical construct of food categories traditional diets from cultures including vegetarian, are not well represented. Although there is an improved break down of the vegetable group, the milk group should be expanded with soy and other alternatives as there are many lactose intolerant Americans. Perhaps several pyramids of different standard diets should be considered to help the mixed culture of Americans pick the diet closest to their preferences. The meat and bean group is not broken up well either. Several source recommend red meat only occasionally. The title of this group is misleading American to daily consumption of red meat. The American Dietetic Association (ADA) would seem by its position that appropriately planned vegetarian diets are healthful, are nutritionally adequate, and provide health benefits in the prevention and treatment of certain diseases, not to encourage red meat. perhaps food groups should be expanded. A separate legumes, beans and nuts may encourage Americans to eat more of a variety as recommended.

Sincerely, <

Marianne Izuka
Marianne Izuka

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10/27/03

October 20, 2003

To: The Food Guide Pyramid Reassessment Team

From: Nutrition Assessment Graduate Class (NTR 523), Fall 2003

State University of New York at Buffalo

Buffalo, New York

Class Assignment:

Review of Food Guide Pyramid Revision Plan for 2005; Tables 1-5

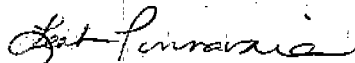
The Nutrition Assessment Graduate Class at the University of Buffalo consists of Dietetic Interns, Nutrition Graduate Students, and PhD candidates who are incorporating nutrition into their research. Overall, the class was very pleased that the Food Guide Pyramid is being revised. The addition of subgroups and different energy levels based on gender, age and activity are changes that seem long overdue. Here is a list of additional ideas and concerns that the class hopes will also be taken into consideration:

1. Standardizing all serving sizes into cups may be helpful for some of the groups; however, it may be confusing in the grain group. Also, should Fats be listed as grams? It seems more realistic to specify servings of fats as teaspoons so that the general public can visualize what a serving should be.
2. Distinguishing the difference between solid fats and then soft margarines and oils seems like a step in the right direction. However, shouldn't we include further subgroups to distinguish between saturated, monounsaturated, polyunsaturated fats since we should have a balance of all types?
3. There should be a way to distinguish low fat from high fat dairy somehow in the pyramid. Should we assume that people would know to only consume low-fat or non-fat dairy especially in terms of the different Calorie levels and how many servings are recommended for each level? Could high fat dairy be included at the top of the pyramid to be used sparingly or could guidelines be given on how much high fat dairy should be consumed per day/week?
4. Should red meat be separated from other meats such as poultry and fish? Maybe it could be placed in its own category at the top of the pyramid to be used on rare occasions, similar to what the Mediterranean Food Guide Pyramid recommends.
5. Table 3 includes activity levels and energy requirements. There are no Calorie levels for women athletes who may need 2600-3200 Calories a day.
6. Needs for Pregnancy and Lactation should be considered. Will there be a separate table considering the needs for this group?
7. Could there be a way to distinguish cooking methods for specific food groups or in general could fried foods be listed at the top of the pyramid (use rarely)?
8. Should legumes be listed under vegetables, or should they be categorized separately? Some think they should have their own group and be consumed daily. If they are put into their own group, more people may choose them on a daily or weekly basis.

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9. Age grouping of nutrient requirements seems too wide. For example, would a 55 year old have the same nutrient needs as a 70 year old?
 10. Activity level determination seems too vague. Perhaps a clearer instruction of how to determine your energy level should be included.
 11. How about including recommendations for water intake?
 12. Table 5 -- overall everyone felt that this table seemed redundant and a source of confusion.
 13. How about considering wine or alcohol in a separate group such as in the Mediterranean Food Guide Pyramid. This could help Americans choose between different types of alcoholic beverages and the amount that should be consumed in a day. Too many Americans are under the impression that binge drinking sporadically is acceptable if only done once in a while. If wine and other alcoholic beverages were included, people may realize the importance of moderate, consistent intake.
 14. Since many adults have some form of lactose intolerance, could dairy alternatives be listed as a subgroup for dairy?
 15. Table 4 does not seem to consider fortified foods. Also, what about use of supplements? Could guidelines be given for supplementation so Americans can choose more wisely?
 16. How is all of this information going to be presented in a way that the majority of Americans can understand it and follow it? This will certainly be a challenge. Many people will need education. Any thought for education programs for lay people?
 17. Other ideas instead of using a pyramid: Shopping cart with foods that should be consumed in larger amounts at the bottom and foods that should be eaten rarely on the top. Pie chart. Plate chart, what our plates should look like at meals and snacks.

We are pleased that the USDA is planning to revise the Food Guide Pyramid. It would be naïve to think that such a complex issue could be presented in a one-page simplified way. It certainly will be a challenge for all of the members of The Reassessment Team to present this information to Americans so that all can understand. Thank you for your hard work that lies ahead and for considering our ideas about The Food Guide Pyramid revisions.

Sincerely,



Leah Pinnavaia, MS, RD, CDN
Adjunct Nutrition Instructor
NTR 523, Nutrition Assessment, Fall 2003 Class
State University of New York at Buffalo
Department of Exercise and Nutrition Science

1972 Rosenbaum

20 Peterson Road
Hillsborough, NJ 08844

received
10/27/03

October 27, 2003

KT

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

RE: Public Comments on the Food Pyramid Guide

Thank you for seeking public opinion on the Food Pyramid. As the dietary model behind federal food programs, including the National School Lunch Program, the Pyramid needs to evolve with nutrition science. My son will be seven in January and has been a vegan all his life.

When the Dietary Guidelines Advisory Committee convenes to review current policy, I hope they will emphasize the Vegetarian/Vegan Six Food Groups: Whole Grains and Starches, Legumes, Green and Yellow Vegetables, Nuts and Seeds, Fruits, Vitamin and Mineral Foods.

Present guidelines advise two to three daily servings of dairy products along with meat as a main protein source. While this plan successfully promotes the meat and dairy industries, it ignores numerous studies linking saturated fat and cholesterol in meat, eggs, and dairy products with heart disease, cancer and stroke--the top three killers in the U.S.

Dairy products alone are associated with obesity, high blood pressure, juvenile onset diabetes, prostate and breast cancers, allergies, nasal congestion and ear infections, according to the American Heart Association.

One of two Americans will die from heart disease. The excess saturated fat (mostly from animals) and cholesterol (entirely from animals) will be the cause in most cases. The American Dietetic Association claims that vegetarian diets reduce the risk for coronary artery disease, hypertension, diabetes mellitus, colorectal cancer, lung cancer, kidney disease, and obesity.

Children, in particular, deserve alternatives to the fatty fare on school lunch lines. In a 1999 American Heart Association Scientific Sessions report, one in six teenagers' hearts showed significant blockage and the arteries of five-year-olds were clogged with fatty patches. Veggie burgers, soy cold cuts and soymilks are great substitutes for corn dogs, pizzas and milkshakes.

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Rosenbaum

The FDA links contaminated meat goods with six and a half million cases of food poisoning and six thousand deaths every year. Animal-based meals contain residues of growth-inducing hormones and antibiotics. In fact, antibiotic abuse on factory farms has led to what the scientific community labels Super-Bugs-Bacteria. SBB are resistant to current antibiotic therapies.

The Vegetarian/Vegan Six include all the essential carbohydrates, fats, protein, vitamins, minerals and water necessary for a balanced and healthy diet. They also prevent disease and obesity. Please revise the Food Guide Pyramid to reflect vegetarian sources of protein, calcium and other vital nutrients.

The Vegan Food Guide is as follows; at the top of the pyramid gives sources of Omega-3 Fatty Acids, Vitamin B12 and Vitamin D. The next level addresses the fortified soymilk and alternates (6-8 servings) and beans and bean alternates (2-3 servings), the next level includes; vegetables and Fruit. The bottom of the pyramid includes grains (6-11 servings).

Thank you for your consideration.

Sincerely,



Rose Reina-Rosenbaum

P. S. In addition to the Vegan Food Guide, eat a variety of foods from each of the food groups. Drink 6-8 glasses of water each day and limit intake of concentrated fats, oils and added sugars, if used.

1991 Fletcher
received
10/21/03
KT
October 10, 2003

Eric J. Hentges, Executive Director
Center for Nutrition Policy and Promotion
Food Guide Pyramid Reassessment Team
USDA CNPP
3101 Park Center Drive, Room 1034
Alexandria VA 22302

Dear Mr. Hentges:

RE: Proposed Daily Food Intake Patterns for Food Guide Pyramid

I am writing to express concern in regard to the Proposed Daily Food Intake Patterns for Food Guide Pyramid. As the government modifies the food guide pyramid, we are pleased that the revision suggests daily intake amounts of essential alpha-linolenic acid (ALA), however food sources noted of this essential fatty acid are misleading and incomplete. I realize that the main food sources of ALA in the American diet based on national surveys are canola oils and soft margarines, but as American consumers begin to think about changing their personal dietary choices, they may want to know more about walnuts. Walnuts are unique as one of the only whole food sources of ALA – often thought, as mentioned, to be only in canola oil and canola based soft margarines. In addition, walnuts are also lower in calories and saturated fat than canola oil plus offer protein, fiber and other nutrients. In fact as you know, the Food and Drug Administration (FDA) affirmed the health claim, "Supportive but not conclusive research shows that eating 1.5 ounces per day of walnuts as part of a diet low in saturated fat and cholesterol may reduce the risk of heart disease. See nutrition information for fat content." This FDA decision comes in response to a petition filed by the California Walnut Commission, which highlights a body of international scientific research substantiating the specific benefit of consuming walnuts as part of a heart healthy diet in reducing the risk of heart disease. The body of evidence suggests that the nutritional composition of walnuts contribute to these heart health benefits.

Clearly, further steps need to be taken to place greater emphasis on utilizing walnuts as a rich source of ALA. I hope the USDA will join the U.S. Food and Drug Administration, the Food Nutrition Board of the National Academy of Sciences and other recognized agencies such as the American Heart Association in acknowledging the health benefits derived from the ALA in walnuts as they make their revisions to the Food Guide Pyramid.

I urge you to please consider this recommendation.

Thank you for your efforts!

Sincerely,

Marjorie A. Fletcher S. Overton
W. H. Haynes
Ann Wenner
Dandra Overton

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received
10/27/03

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

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The Vegetarian/Vegan Six include all the essential carbohydrates, fats, protein, vitamins, minerals and water necessary for a balanced and healthy diet. They also prevent disease and obesity. Please revise the Food Guide Pyramid to reflect vegetarian sources of protein, calcium and other vital nutrients.

Thank you,

Tracy Jordan

Ms. Tracy Jordan

1992 Dym52a

October 25, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Revision of USDA Food Guide Pyramid

I would like to suggest the need for Food Guide Pyramids for different age groups. With this in mind, I have developed a Food Guide Pyramid I use in my nutrition workshops with RI Aging 2000, an organization devoted to educating seniors.

A copy of my pyramid is enclosed. It is not perfect, but may give you some useful ideas for your pyramid revisions.

Sincerely,



Henry A. Dym52a
Professor Emeritus, University of Rhode Island

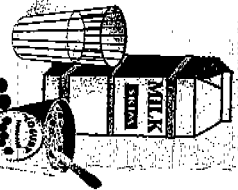
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FOOD GUIDE PYRAMID FOR OLDER AMERICANS

FATS, AND SWEETS — use sparingly

LOW FAT

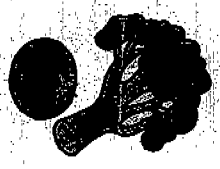
MILK, YOGURT, AND CHEESE GROUP
2-3 servings daily



FATS: fish for omega-3 (EPA and DHA) and plants for mono. and poly unsat. fatty acids.

BREAD, CEREAL, RICE, AND PASTA GROUP.

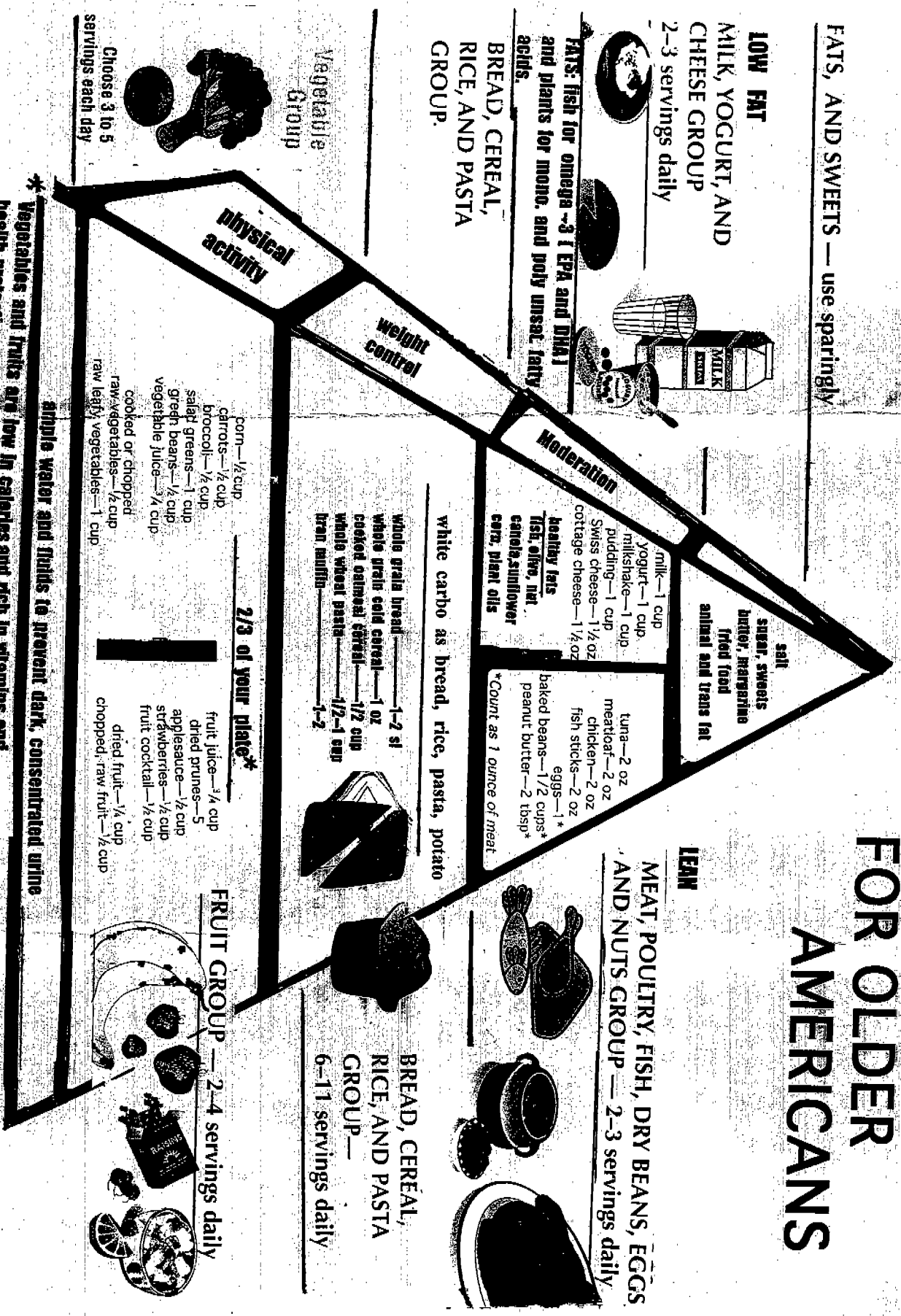
Vegetable Group



Choose 3 to 5 servings each day

*Vegetables and fruits are low in calories and rich in vitamins and health protective phytochemicals as antioxidants and flavonoids.

Based on American Dietetic Assoc. Food Guide Pyramid for Older Americans, 1998



CHS

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KT

October 27, 2003

Food Guide Pyramid Reassessment Team
ATTN: Eric Hentges
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Reference: 68Federal Register 53536, dated September 11, 2003

Subject: Center for Nutrition Policy and Promotion; Notice of Availability of Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data and Announcement of Public Comment Period

Dear Mr. Hentges,

CHS Inc welcomes this opportunity to make comments concerning the USDA food pyramid.

CHS Inc -- an agricultural cooperative -- is a diversified agricultural foods company committed to providing the essential resources that enrich the lives of those whose lives it touches. A Fortune 500 company, CHS is owned by over 350,000 farmers and ranchers and 1,100 cooperatives in 28 states from the Great Lakes to the Pacific Northwest and from the Canadian border to Texas. CHS provides products and services ranging from grain marketing to food processing to meet the needs of customers around the world. It also operates petroleum refineries/pipelines and, through a broad range of working partnerships, markets and distributes Cenex ® brand energy products, along with agronomic inputs and feed to rural America.

Page

Comments

53536 Summary Section.

The stated purpose of the proposal is to "create a framework" that can help consumers assess and improve their diets." The assumption is that the proposal can have value to the consumer if his health and resulting quality of life can be improved.

If the assumption is correct, the content of the current proposal fails to address the equal importance of physical activity with diet in the pursuit better health and quality of life. If the intent of the proposal is about improving health, consumer understanding of what and how much they put into their bodies as it relates to types and amounts of physical output is essential.

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53538 Section V.1. Comments on appropriateness of using sedentary, reference-sized individuals in Table 2.

Tables are found at www.cnpp.usda.gov/pyramid-update.

Assigning target caloric intakes based on sedentary individuals is appropriate, as a high percentage of Americans are unfortunately not very active. If the target were to be based on low-active individuals, for example, the caloric intake would be too high for much of the population. However, it is important to recommend an increase in physical activity for improved health. We therefore welcome the regulatory comment, "CNPP does plan to encourage physical activity in Food Guide Pyramid materials designed for consumers."

Table 2 comments: Definition of energy levels is difficult to equate to forms of exercise other than walking.

The proposal as written, includes a very brief, topical reference to patterns of physical activity. Sedentary, Low Active and Active are broad categories defined by gender and age with suggested caloric intake in Table 2.

Table 2 gives a broad set of references to physical activity as it might relate to the 3 patterns of physical activity. The content of the notes fall short of developing the importance of physical activity as it relates to dietary improvement and its intended positive impact on health and improvement in quality of life.

The body is a physical plant that the owner has to manage more effectively to stay healthy longer. Understanding the content and amount of fuel needed to run the plant efficiently without costly repairs is an inseparable part of having a well-balanced throughput whose net result is good physical and mental health.

This proposal needs to embrace both of the key aspects to better health... the dual roles of diet and physical activity. People feeling good and feeling good about them selves, their relations with those around them and their contributions to the community in which they live should be the focal point of this proposal, not just dietary guidelines.

We are missing the boat unless this proposal is expanded to address resolution of the entire need of the consumer in his pursuit of a better life through the self managed balance of diet and physical lifestyle.

53538 Section V.2. Appropriateness of the selection of nutritional goals

CNPP addresses the "Nutritional goal for vitamin E." It notes that the consumption of vitamin E is currently far less than the new RDA [Recommended Dietary Allowance]. Under current typical food intake types, the RDA is unachievable, but to meet it would require substantial changes in typical intakes - which CNPP does not want to make.

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We would hope that CNPP would find other means to communicate and recommend supplementary vitamin E intake in an advocacy program for more oil consumption—soybean, sunflower and safflower.

53539 Section V.3. Comments on appropriateness of the proposed food intake patterns for educating Americans about healthful eating patterns.

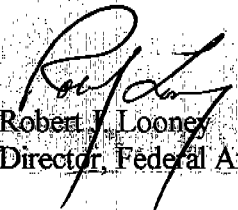
1. Proposed intakes of less solid fats could force consumers to make different choices, taking more notice of ingredient statements, etc as it relates to sources of fats. This will force food companies into potentially reformulating many of their current products, to lessen or eliminate the use of hydrogenated oils and solid shortenings.

2. The absence of data on trans fats was noted. And although CNPP does plan to "provide information about limiting consumption of trans fats in materials designed for consumers," we hope the rulemaking process allows for draft comments before material publication.

53539 Section V.4. Comments on appropriateness of using "cups" and "ounces" versus "servings" in consumer materials.

The use of cups and ounces would be better understood by consumers than the use of servings. What the average consumer might consider to be one "serving" is more likely closer to two or 3 servings. This confusion on serving sizes can easily lead to over consumption of the food groups.

Thank you for your consideration.


Robert J. Looney
Director, Federal Affairs

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October 27, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
Room 1034
3101 Park Center Drive
Alexandria, VA 22302

RE: Propose Food Guide Pyramid

On behalf of the Humane Society of the U.S. (HSUS), the country's largest animal protection organization with more than 7.8 million supporters nationwide, I would like to submit comments on the proposed Food Guide Pyramid as found in the Federal Register

Animal Welfare

In light of the animal welfare problems associated with large scale industrial agriculture, which provides us with most of our food, the HSUS is dedicated to promoting the idea of eating with conscience. This dietary guide promotes the 3 Rs which are as follows:

- **Refine** your diet by purchasing only organic, sustainable, and humanely raised meat, eggs, and dairy products.
- **Reduce** your consumption of meat, eggs, and dairy products.
- **Replace** the meat, eggs, and dairy products in your diet with nonanimal foods.

The latter two goals are within the scope of the food guide pyramid. We would therefore urge that changes be made to the Food Guide Pyramid in order to promote a more plant based diet.

Human Health

It is increasingly evident that diets with little or no animal products can be beneficial for human health. The American Dietetic Association and Dietitians of Canada found in their review of vegetarian diets that appropriately planned vegetarian diets are healthful and nutritionally adequate. They also found that a vegetarian diet can provide health benefits in the prevention and treatment of certain diseases. Compared to nonvegetarians, vegetarians have been reported to have lower body mass indices, lower blood pressure, lower rates of death from ischemic heart disease, and lower rates of hypertension, type 2 diabetes, prostate and colon cancer.¹ These diseases are of major concern because they cost billions in health care costs and untold numbers of deaths. However, despite the increasing knowledge of the potential dangers of high animal product consumption, people are eating more meat than at any time in history. Citizens of the USA consumed

¹ Position of the American Dietetic Association and Dietitians of Canada: Vegetarian diets. American Dietetic Association Reports. June, 2003(103)6:748-765

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around 219 pounds of meat per capita in 2002, versus 166 pounds in 1960.² Since the Food Guide Pyramid can have a profound effect on the eating patterns of Americans it is incumbent on its creators to ensure that it deals with these issues by promoting a reduction in animal product consumption.

Recommended Changes

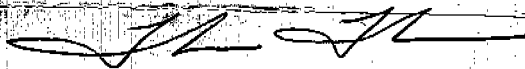
We would therefore recommend changes based on the findings of the Harvard School of Public Health which we feel accurately portray what is scientifically known about good eating habits.³ According to their research the current food guide pyramid sections that deal with animal products should be changed as follows:

- Take Red Meat and Butter from their respective sections, label "Use Sparingly" and place at the top of the pyramid
- Rename the Milk, Yogurt, and Cheese Group the "Dairy or Calcium Supplement", label "1 to 2 times" and place under red meat. We would further suggest that other sources such as enriched soy milk should be added.
- Rename and separate the Meat, Poultry, Fish, Dry Beans, Eggs, and Nuts Group into:
 - "Fish, Poultry, and Eggs" label "0 to 2 times" and place under "Dairy or Calcium Supplement";
 - "Nuts and Legumes" label "1 to 3 times" and place under "Fish, Poultry, and Eggs".

These changes would help to lower animal product consumption by legitimizing the use of nonanimal food products in their place and it would provide a plan that could be followed by vegetarians and others who don't consume animal products.

In conclusion we would urge that the food guide pyramid is altered to promote a more plant based diet for animal welfare and human health reasons. Thank you for your time and consideration.

Sincerely,

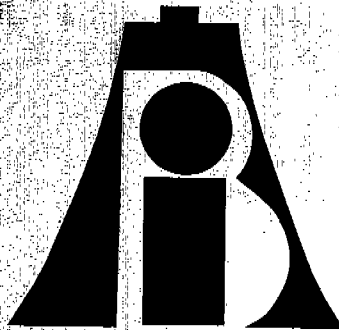


Tamiko Thomas, M.Sc.
Animal Scientist-Program Manager
Farm Animals and Sustainable Agriculture
The Humane Society of the United States

² U.S. Eating More Meat. WATT PoultryUSA January, 2003:10

³ Harvard School of Public Health website: www.hsph.harvard.edu/nutritionsource/pyramids.html

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received
10/21/03

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INDEPENDENT BAKERS ASSOCIATION

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www.independentbaker.org

October 27, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

Re: Center for Nutrition Policy and Promotion; Notice of Availability of Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data and Announcement of Public Comment Period
Federal Register Notice September 11, 2003

To Food Guide Reassessment Team:

The September 11, 2003 Federal Register proposed to review the Food Guide Pyramid, updating food intake pattern and identifying amounts to consume from each food group. One of the major issues debated is whether the bottom pier of the Pyramid, consisting of bread, cereal, and pasta, should be modified, such as being replaced by the fruit and vegetable group, or if there should be a decrease in servings. As of now, the number of suggested daily servings for grain-based foods is 6 to 11. There are plans to alter the suggested amounts of breads, making them more "nutritionally appropriate." The Independent Bakers Association (IBA), is a trade association consisting of small to medium-sized, family-owned wholesale bakeries and allied partners of the baking industry, want the benefits of grains to be properly diagrammed on the food Guide Pyramid. **Grain foods have been shown to decrease your risk of cancer, heart disease, birth defects, and type 2 diabetes. They also provide assistance in maintaining a healthful weight.**

"Grains of Truth"

Consumers' perceptions of grain products in the United States are worsening, as stated in a recent study entitled "Grains of Truth," commissioned by the Wheat Foods Council. Consumers are confused by the plethora of nutrition information in the news and on bookstands. Most alarming is that many dieters are likely to eliminate grain foods, the

2405 pyle
foundation of the Food Guide Pyramid. In fact, grain foods, such as bread and pasta were eliminated almost as often (28%) from the diet as fats (24%), and more often than salty snacks (15%) and meats (15%).

Benefits of Grains in Diets

Numerous documented studies show the health benefits of complex carbohydrates and grain-based foods. Consider these facts:

A released US Department of Agriculture (USDA) study, "A Comparison of Low-Carbohydrate vs. High-Carbohydrate Diets: Energy Restriction, Nutrient Quality, and Correlation to Body Mass Index," showed **participants on high-carbohydrate diets consumed 300 fewer calories per day than those on very low-carbohydrate diets.**

The study based, based on food intake data from 10,014 adults across the United States, also showed adults who ate high-carbohydrate diets were more likely to be in the normal weight range, with the lowest average body mass index. Additionally, **high-carbohydrate diets were indicated to be more nutritious than low-carbohydrate diets, providing greater intake of vitamins A, C, carotene, and folate, and the minerals calcium, magnesium, and iron.** (Source: USDA Agricultural Research Service. *Journal of the American College of Nutrition*. June 2002. Wheat Foods Council online.)

Many European countries, such as Italy and France, whose citizens consume more bread and pasta than Americans, have a much lower incidence of obesity than the United States. Italy's incidence of overweight and obesity is only 37 percent compared to the US's 61 percent. France is only 31 percent. (Source: *Institute of European Food Studies*. Trinity College. Dublin. 1999. Wheat Foods Council online.)

The American Kidney Fund (AKF) issued a warning stating the organization has long suspected high-protein diets negatively impact health, but they now have research to support their claims. **According to AKF Chairman Paul Crawford, M.D., "Increased protein intake leads to a buildup of nitrogen in the blood. The nitrogen ends up at the kidney in form of urea, where it needs to be cleaned from the body and gotten rid of in the urine. The resulting increase in urination can cause dehydration, further straining the kidneys."** Taking care of the kidneys is important, due to the fact there is no cure for kidney failure. (Source: *American Kidney Fund*. April 25, 2002. Wheat Foods Council online.)

A study published in the *Journal of the American Dietetic Association* (1980) looked at the consequences of a high-protein, low-carbohydrate diet. The authors concluded that **"diets, such as this [Dr. Atkins' Diet Revolution], may increase the long-term risk of arteriosclerosis" – a disease characterized by sudden spurts in the growth of fat and cholesterol- loaded deposits that clog arteries, which may lead to heart disease.** (Source: *Journal of the American Dietetic Association*. 1980. Wheat Foods Council online.)

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The American Heart Association (AHA) Nutrition Committee released a scientific advisory warning against the use of high-protein diets for weight loss. According to the AHA, these popular diets may cause short-term weight reduction due to fluid loss from eliminating carbohydrates, but the increased consumption of animal protein, which is high in saturated fat, and the decrease in consumption of vegetables and fiber, which contain essential nutrients and help reduce cholesterol, can contribute to coronary heart disease, diabetes, and stroke. **The AHA recommends a daily dietary balance of about 15 percent of calories from protein, 30 percent from fat, and 55 percent from carbohydrates – combined with regular exercise.** (American Heart Association, October 2001. Wheat Foods Council online.)

Low-carbohydrate Diet: Cons

Many of the first pounds lost on a low-carbohydrate diet come from water, not fat. It is believed that when you are not eating enough carbohydrates, your body begins to burn your stored carbohydrates for energy, which releases a lot of water weight. The body then breaks down lean body tissues in an effort to provide glucose for energy and brain function.

Research has not yet determined the long-term effectiveness or risks of the low-carb diet. According to the recent October issue of "Mayo Clinic Women's HealthSource" there is concern in the medical community about the long-term effects of the low-carb diet in America's health. There is plenty of evidence that a diet rich in grain, reduces your risk of numerous health concerns.

Goodness of Grains

Numerous studies have shown that grain foods, particularly breads and pastas, are protective against some cancers, including those affecting the colon, stomach, breast, liver, pancreas, gall bladder, prostate, ovary, bladder, and kidney. Grains can help maintain a healthful weight because they satisfy the appetite, delay hunger, and provide half the calories of fat. Numerous studies show grain foods, especially whole grains, are protective against type 2 diabetes. The Iowa Women's Health Study and the Harvard study showed an inverse relationship between whole grain consumption and type 2 diabetes. In these two studies, neither found an adverse effect from enriched grain consumption. Enriched grain foods contain folic acid, which reduces the risk of neural tube defects, such as spina bifida and anencephaly.

Grains also are easily burned by the body for energy. Unlike protein and fat, carbohydrates are readily stored in muscles to be used during exercise. Carbohydrates give endurance and energy during physical activity. Carbs help replace muscle fuel (glycogen) when it becomes depleted during physical activity. By consuming larger portions of carbohydrate-rich foods, like grains, and moderate amounts of protein and fat, glycogen stores are better replenished, providing fuel to the body.

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Importance of Maintaining Current Food Guide Pyramid

A new study done on women indicates that following the Department of Agriculture's Food Guide Pyramid, eating grains can reduce the risk of death by about 30 percent. The study surveyed 42,000 women about their normal diets, then tracked them for six years. Those who followed the USDA Food Pyramid most closely were, on average, 30 percent less likely to die from any cause than women who did not follow the guidelines, according to findings published this week in the Journal of the American Medical Association. Moreover, women with most healthful diets were 40 percent less likely to die of cancer and 33 percent less likely to die of heart disease than women with the worst diets.

Obesity in America

The bottom line is that obesity has become an American epidemic, and one that needs careful evaluation and a solution. No one can blame obesity on grains being at the base of the Food Guide Pyramid. In fact, when Dr. Atkins first published his low-carb diet in 1972, it sold millions of copies and millions of Americans are on his high-protein/high-fat-diet. During that time, obesity has increased exponentially.

Consider Asia and their extremely high-carbohydrate diets. The obesity rates in China (less than 15 percent), Republic of Korea (22 percent), Thailand (20 percent), and Japan (less than 3 percent) are far lower than in the United States (61 percent). (Source: *Obesity Task Force, 2000.*)

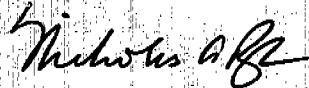
Conclusion

The Food Guide Pyramid is a tool for Americans to make daily food choices that meet nutritional standards. The Food Guide Pyramid is one of the most widely recognized icons in America, with a 80-plus rate of recognition, and if the servings of grains are changed it could be a major problem facing grain producers.

Grains provide Americans with needed vitamins, minerals, fiber and complex carbohydrates. Grain-based foods have nothing to do with the rising obesity epidemic in this country. The benefits of grains have been shown in the above pages. Americans need to stop blaming carbohydrates for weight problems. Simply put, Americans need to cut down on caloric intake and increase their physical activity.

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Independent Bakers Association has demonstrated its concerns over the need to maintain grains at the base of the Food Guide Pyramid. Furthermore the group is actively working to have the Food Guide Pyramid take a more active role in nutrition education.

Sincerely,



Nicholas A. Pyle

CC: IBA Board of Directors



Council for Responsible Nutrition

received
10/27/03
KT

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Dickinson

October 27, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

RE: Comments on The Food Guide Pyramid

The Council for Responsible Nutrition (CRN) appreciates the opportunity to comment on USDA's review of The Food Guide Pyramid. CRN shares the agency's commitment to providing consumers with the most current nutritional standards to help them assess and improve their diets.

The Council for Responsible Nutrition is one of the industry's leading trade associations. CRN represents a wide range of manufacturers of dietary supplement ingredients and of finished products, including national brands and store brands available in the mass market and products distributed through natural food channels, as well as dietary supplements marketed through direct sales and by mail order.

USDA Center for Nutrition Policy and Promotion (CNPP) has solicited written comments on revisions to The Food Guide Pyramid. CRN respectfully submits the following suggestions for consideration by the Center.

Scientific Evidence

There is a growing body of scientific research that indicates the important role that dietary supplements, particularly the multivitamin, play in a good nutrition program and overall healthy lifestyle.¹ In addition, this evidence combined with economic studies suggests the appropriate use of some dietary supplements can promote good health as well as help reduce the risk of certain diseases, thereby potentially reducing health care costs.² Consequently, we urge the USDA as it evaluates The Food Guide Pyramid and the important health advice it offers consumers, to consider incorporating the consistent and appropriate use of dietary supplements, and specifically the multivitamin, as part of advice to consumers on good dietary habits.

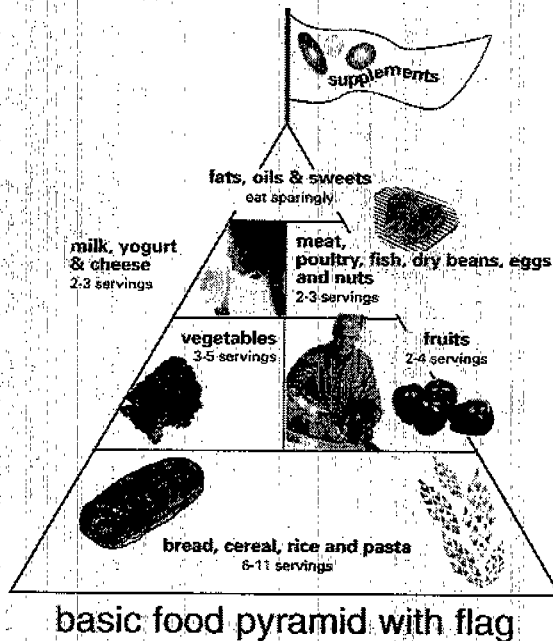
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For example:

1) Adding a "supplement flag" to The Food Guide Pyramid

Scientists at the USDA Human Nutrition Research Center on Aging at Tufts University have given careful thought to the nutritional needs of the elderly. Older people have lower energy needs and tend to eat less. A national survey showed that about 40 percent of people over 70 consumed less than 2/3 of the recommended energy intake, making it difficult to get recommended amounts of nutrients. Calcium, vitamin D, and vitamin B-12 are of particular concern in the elderly. The researchers emphasize the importance of educating older Americans to select nutrient-dense foods within all the food groups. To assist in nutrition education, the scientists have developed a modified Food Guide Pyramid for the elderly. It sits on a base of water, emphasizing the need for at least 8 glasses of water daily. Symbols are added to encourage the consumption of more fiber-rich grains, fruits, vegetables, and legumes. "Finally, a flag should be placed on the top of the 70+ Food Pyramid indicating that supplements of calcium, vitamin D and vitamin B-12 are frequently appropriate to promote optimal health."³

Building on the model developed by researchers at the USDA Human Nutrition Research Center on Aging at Tufts University, the Council for Responsible Nutrition has developed a food guide pyramid with a flag on top as a reminder that most people should add one or more nutritional supplements as components of their daily dietary regimen.



2) Adding a sidebar recommending multiple vitamins

In the June 19, 2002 issue of *JAMA* (Journal of the American Medical Association), two Harvard researchers reviewed more than 30 years of articles about vitamins in relation to

343 Dickinson
chronic diseases and published their findings in two companion articles,⁴ stating their recommendation that "...all adults take one multivitamin daily."^{4,5}

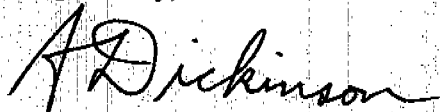
Also, in a book about diet and health, Dr. Walter Willett offers a "Healthy Eating Pyramid" that places more emphasis on whole grains, decreases the emphasis on dairy products, and relegates refined grain products as well as red meats and butter to the tip of the pyramid, along with sweets and fats—to be consumed "sparingly." A sidebar accompanies the pyramid, recommending **"multiple vitamins for most."**⁶ (emphasis added)

Conclusion

There is no question that the amount of scientific evidence in favor of consistent use of vitamins, particularly multivitamins, is formidable and must be taken seriously, both by the medical community and by those who create public policy. Research suggests that regular use of some dietary supplements is a sensible choice for most people. Key nutrition researchers, government nutrition policies, and health professional groups increasingly recognize the fact that despite best efforts, most people do not get an optimal amount of nutrients by diet alone. As we continue to educate and improve consumer behavior in that area, we need to also recognize that supplements, while never serving to replace healthful eating, are a convenient and affordable way to bridge the nutrition gap.

We appreciate this opportunity to provide comments on some aspects for the revision of The Food Guide Pyramid.

Respectfully,



Annette Dickinson, Ph.D.
President

¹ Dickinson A. *The Benefits of Nutritional Supplements*. Council for Responsible Nutrition, Washington, DC, 2002.

² DaVanzo J, et al. "A Study of the Cost Effects of Daily Multivitamins for Older Adults." The Lewin Group, October 2, 2003 [press release].

³ Russell RM, Rasmussen H, Lichtenstein AH. Modified food guide pyramid for people over seventy years of age. *J Nutr* 1999; 129:751-753.

⁴ Fairfield KM, Fletcher RH. Vitamins for chronic disease prevention in adults: scientific review. *JAMA* 2002; 287:3116-3126.

⁵ Fletcher RH, Fairfield KM. Vitamins for chronic disease prevention in adults: clinical applications. *JAMA* 2002; 287:3127-3129.

⁶ Willett WC. *Eat, Drink and Be Healthy*. Simon & Schuster Source, New York, 2001.

10/27/03
Fabian

received
10/27/03

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Rm. 1034
Alexandria, Virginia 22302

Dear USDA Center for Nutrition Policy and Promotion,

I support the revised food pyramid. When the old food pyramid was released a typical American got approximately 40% of their calories from fat, about 15% from protein, and about 45% from carbohydrates. Since most red meats are high in saturated fat nutritionists did not want to recommend an increased intake in red meats. Based on this reasoning, fats were considered bad and carbohydrates were considered good. The old food pyramid suggested that no more than 30% of daily calories should come from fat. However, no research was done to prove that low-fat diets have long term health benefits. With further research it has been found that not all food containing fat is bad for your health. Some studies have found certain types of fats to be beneficial. The new pyramid is more of a guideline for healthy eating. Instead of stating that all carbohydrates are good they specify that whole wheat products should be consumed more regularly than white breads and pasta. In the same respect it specifies that all fat is not necessarily bad. Oils such as peanut and fish oils are now proven to actually have health benefits. The more specific nature of the revised pyramid is what makes it much more beneficial and informative than the older outdated pyramid.

The rebuilt food pyramid also weaves in some other important methods in maintaining good health. The base of the pyramid includes exercise and daily weight control. It also includes vitamin supplements and alcohol within moderation. These new revisions take into account research studies that suggest them as being beneficial in a healthy life style and also help in making the new food pyramid more helpful in planning a healthy lifestyle.

Even though the new pyramid is definitely an improvement from the old, revisions would make it even more beneficial. For example, including how much time should be spent on exercise. Also it would be helpful to know the kinds of food that are included in some of the categories and what vitamins are most important in maintaining health.

In conclusion, the food pyramid is ongoing and changing. The more information we acquire about the foods we eat the better we can make the food pyramid convey the most healthy food choices. Overall the new pyramid is more helpful than any others previous to it.

Sincerely,

Jessica Fabian

Jessica Fabian

received
10/21/03
KT

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

Dear USDA Center for Nutrition Policy and Promotion:

I support the revision of the Food Pyramid that was released in 1992. When the 1992 pyramid was being developed, the average American consumed 40% of calories from fat, 15% from protein and 45% from carbohydrates. The idea of "Carbohydrates are good for you and fats are bad," was taught by the old (1992 version) food pyramid.

Today, with research studies, we know that not all fats are bad for you, and that eventually carbohydrates that are not used, will be turned into fat. Along with that, we should replace saturated fat with polyunsaturated fat and not with carbohydrates.

The problem with carbohydrates is that the complex carbohydrates contain sugars such as glucose and fructose. Sugar contains no minerals or vitamins, which primarily serves as no nutritional value. Certain carbohydrates are a good source of energy such as white bread and white rice which can be broken down into sugar glucose. This type is the main fuel for the body. The re-movement of starch from these types of carbohydrates removes many vitamins and minerals and fiber. These carbohydrates increase glucose levels in the blood more than whole grains do. A good example would be eating a boiled potato. A boiled potato raises blood sugar levels higher than eating the same amount of calories from table sugar. Potatoes are mostly starch, and they can be quickly metabolized to glucose.

The new version of the food pyramid will contain an equal amount of intake from all of the food groups. This will decrease the amount of carbohydrates and increase the intake of protein and other nutrients. I would recommend that along with the food group pyramid revision, that a schedule of when you should eat certain foods. For example, have your most carbohydrate intake in the morning along with high fats. It provides a good source of energy for the day, and the whole day to burn off the carbohydrates and fats. Meat and poultry should be eaten before and after harsh workouts. And fruits and vegetables used throughout the day as snacks. Also, the old food pyramid only says how frequently you should eat foods from the different food groups. It fails to mention how you should eat those foods. For example, canned vegetables contain high amounts of salt and mostly recommend adding butter for taste.

Sincerely,

Kristen Burns
Nursing Student
Curry College

10/21/03 Mary

received
10/21/03
KT

October 26, 2003

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA. 22302

To Whom It May Concern:

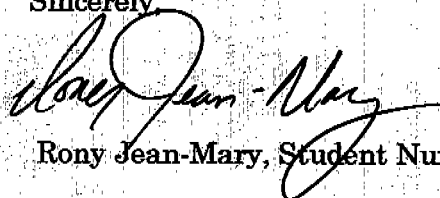
I recently had the opportunity to review the revised food pyramid. Although it may take some time to incorporate it into my life, I am looking forward to doing so. I was particularly impressed with how the base of the new pyramid was now daily exercise and weight control. Being an African American male, I am quite aware of the risk factors that accompany my race. I am pleased to know that efforts are being made to address these risks.

I strongly encourage you to implement the revised food pyramid for use with the American public. Although it is not perfect, this pyramid is a step up from the USDA's previous one. Its content is based on scientific strategies for reducing risk of coronary artery disease (CAD) and diabetes. First, it differentiates between the fats, clearly educating others about "good fats/cholesterols" and "bad" ones. Second, it encouraged the use of multivitamins. Third, red meat, butter, potatoes, and white rice, bread, and pasta were equated with sweets. The revised pyramid encourages people to consume whole grains at most meals. The original pyramid did not differentiate between whole and processed grains. Forth, the revised pyramid introduces the idea that more than one to two daily servings of dairy increase the risk of cancer. Finally, as mentioned above, the importance of exercise is stressed in the revised pyramid.

There are two improvements that I would encourage you to consider. First, the importance of drinking adequate amounts of water daily should be mentioned. It is dangerous to encourage people to consume an addictive substance (alcohol) "in moderation" and then fail to mention water. Second, I strongly encourage you to make the revised pyramid simpler to interpret. It should be tested for readability with a population that does not have a high school diploma. This is a segment in our society known to be at high risk for many diet-related illnesses. It is a disservice to alienate them from such important information.

In closing, I would like to thank you for taking these necessary steps towards achieving a healthier population.

Sincerely,


Rony Jean-Mary, Student Nurse

October 25, 2003

1001 Schneider

received
10/27/03
KG

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

To whom it may concern,

I am writing in response to the Center for Nutrition Policy and Promotion's request for comments on the proposed Daily Food Intake Pattern's and the accompanying technical support data tables. I feel that the "new pyramid" is a better reflection of our current knowledge of nutrition. It better differentiates between foods that were before grouped together into the same more general categories.

Because it is so difficult to narrow all of the information into a "user friendly" guide, I would hesitate to include exercise in the pyramid. I agree that exercise should be an integral part of the fight to decrease obesity and preventable disease, but I feel that the new pyramid should be a guide dealing only with nutritional issues.

I also feel that a multivitamin recommendation should not be part of this tool. The goal of the food pyramid should be to help American's with their food choices and caloric intake. Because it already involves so many different considerations I do not think it should begin giving recommendations on supplements and ways to burn calories that are consumed.

I appreciate the efforts of all involved in the making of the new guidelines. Nutrition and the health of our country truly go hand in hand.

Sincerely,

Patricia Schneider

Patricia Schneider

October 24, 2003

received
10/21/03

KT

1001 Stoebel

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

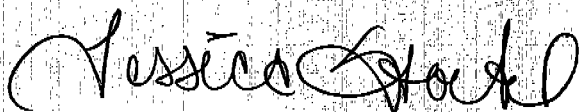
To whom it may concern;

I am writing to you to commend your company on the "New food pyramid".

After reading the article dated December 17, 2002 on Scientific American.com I felt compelled to write to your company. I feel that the new food pyramid is an excellent guideline for our ever "expanding" country. I particularly wanted to highlight on a couple of points that were made in the article. EXERCISE, EXERCISE, EXERCISE; exhibited in the base of the pyramid as a base to build upon. This in itself I think is one of the most important things you can do for your body, when so many people think diet alone will keep them healthy. I also wanted to highlight vegetable fats (polyunsaturated, monounsaturated) displayed as a "good fat" instead of the old theory that all fat is bad; thereby moving saturated fat to the top of the pyramid. I also support the separation of the white carbohydrates from the whole grains; placing the white carbohydrates at the top of the pyramid with the saturated fats and the whole grains at the base with plant and vegetable oils. I am feeling the underlying message is to get away from all animal products; this will certainly get a lot of support from vegetarians. These new changes to the food pyramid will hopefully begin minimizing diabetes, heart disease and high cholesterol. I think it wouldn't hurt to add in a plug for the elimination of tobacco.

I do hope that your company has been receiving a lot of support for all of your insightful efforts.

Sincerely,



Jessica Stoebel

October 19, 2003

10/1
Trilligan

received
10/27/03
KT

USDA Center for Nutrition Policy & Promotion
3101 Park Center Drive - Room 1034
Alexandria, VA 22302

RE: The "New" Food Pyramid

To Whom It May Concern:

I am writing in response to the proposed revised food pyramid structure by the United States Department of Agriculture.

It is great to hear that the USDA is incorporating current research and nutritional knowledge to develop the "new" food pyramid guidelines. The old food pyramid leaves one believing that they are making good choices when in fact they are not. Being overweight is one area where one can benefit from the new pyramid because it will show better groupings of food choices.

Eating white bread, white rice and pasta aid to the problems of obesity due to the fact that these types of carbohydrates are refined and break down into glucose. This refining process also removes many vitamins, minerals and fiber that our bodies need in order to be healthy and develop. Everyone should consider eating dark & whole grain breads and brown rice. Also, it would be beneficial eating various nuts and seeds as they are an excellent source of fiber and should be listed as such on the "new" food pyramid. Your activity level needs to be a part of your daily routine to work in conjunction with what one eats to stay healthy.

As a college student I find it to be very hard in the cafeteria to make good choices as the food is prepared "to taste good" and NOT for the better of the student's health. Using the new pyramid in college cafeterias would give a better understanding of the types of food that should be offered to help with staying healthy and learning to make good choices. Having chicken fried, prepared with sauces and breadcrumbs only goes back to filling your body with "bad fats". Offering students more fresh vegetables, without sauces, nuts and legumes would help in lowering ones intake of bad fats and at the same time improve cholesterol levels. A meatless chili is an excellent way of getting in ones vegetable & protein.

The "old" food pyramid does nothing for the many people having problems with heart disease, cancer, strokes and high blood pressure. It suggests 2-3 daily servings of dairy products and having meat as the main protein. These items are now known through various studies as having saturated fat and being high in cholesterol. Use of the "new" food pyramid would be more beneficial in aiding one to eat more "fresh" fruit & vegetables along with learning more about what a serving size is to help with portion control.

I hope that as a college student and young adult my thoughts and comments will be considered in making the necessary changes in the food groups. This will enable our society to better themselves healthwise and learn the correct choices one should make to improve their overall well being.

With Best Regards,

Heather Trilligan

received
10/27/03

October 22, 2003

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive Room 1034
Alexandria, Virginia 22302

To Whom It May Concern:

Reviewing the old and the new food pyramid guidelines I definitely support the new revised one more over the older one. I noticed how the fruits and vegetables didn't really change much, which I believe to be a good thing and always a necessity. I like basically everything that has been revised, for example I believe that carbohydrates in abundance are really bad for you along with any type of fatty foods.

Being an Italian, eating carbohydrates is basically a huge part of my diet, but with the fact that it can cause heart disease keeps me aware that they are not as good for you as they might taste. I always thought that even white rice was good for you, but reading the new pyramid I realized it was up at the top with all the carbohydrates. I also learned the importance of eating high iron foods, especially for women and people with anemia. So knowing this it made me lean more towards the revision because it's in a category by itself, in the older pyramid it was included with all the meats and the eggs. It was very interesting to see how far up on the pyramid both the meats and the carbohydrates jumped. They were both considerably low and are now at the very peak of it all.

Living with the mother that I have I learned a lot about nutrition, even before I started nursing school. She takes many multiple vitamins, and has always warned me about the unhealthiness of red meats. These are just some of the factors that she has expressed to me that are also conveyed in the pyramid. I agree with the fact that exercise should be a factor these days, and in order to stay health and keep your heart healthy any type of physical exercise is a necessary.

There is one thing about the revised food pyramid that I didn't like though; it seemed to be too vague. It says that you should use alcohol in moderation; just about how many drinks a week is that? And with the whole grain foods and the plant oils, I think this may be too confusing for people if they are not very well educated about nutrition. Is there a limit to how many meals a week you eat these certain things? But over all I believe that the new food pyramid is a great revision and I believe that it will help people become healthier and be warned about the fatty foods and the carbohydrates.

There has always been one thing about the pyramid that has baffled me, why isn't there any consideration about drinking numerous glasses of water a day. I know that staying hydrating and constantly drinking water flushes out your system faster. So wouldn't that be a huge factor to indicate?

Thank you for allowing me to give my opinion, and taking the time to read my letter.

Sincerely,

Tracy Zangarone

1091
Gonzalez

October 19, 2003

received
10/27/03

KT

USDA Center for Nutrition Policy and Promotion
3101 Park Circle Drive
Alexandria, VA 22302

To Whom It May Concern:

I am writing this letter in support of the revision of the food pyramid. The old food pyramid was vague and didn't include the importance of exercise. Healthy lifestyle changes start with good education and if the information is clearer it's for the better. With the new guidelines for hypertension, the type of food being eaten is key and with this new food pyramid there is definition of good and bad fats and carbohydrates and I think that's great.

I hope this revised pyramid will be available soon. A lot of people don't like change but I think it is for the best.

Sincerely,

Sharmecka H. Gonzalez

Sharmecka Horton-Gonzalez
Curry College nursing student

1991
DeAngelis

October 22, 2003

received
10/27/03

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

To Whom It May Concern:

I am writing in regards to the new food pyramid. I agree with and favor the new changes made in the food pyramid. The old pyramid was too broad and misleading. It was made in order for the general public to understand it however, the information was inaccurate and the pyramid was poorly designed. I feel as though the new food pyramid does a much better job of breaking down the categories unlike the old food pyramid that just clumped foods together. For example, they separated the white flour from the other breads and cereals where as the old pyramid had them all in the same category.

The old pyramid had fats as all being bad and should be use sparingly which in reality not all fats are bad for you and we need them which is why the new pyramid puts them on the bottom along with whole grain foods. The new pyramid limits the servings of diary from 2- 3 to 1-2. I also like how red meat is separated from fish and poultry because too much red meat can lead to heart disease. Also, I like how on the very base of the pyramid it mentions daily exercise and weight control which is important and most people tend to forget that it is. Another thing that the new pyramid includes that I think is also important is the use of alcohol and vitamins.

In closing, I would just like to say that I think that this food pyramid is much more accurate and it should have been designed this way in the first place instead of simplify things. I think that the general public will learn a lot about the foods they eat by putting this food pyramid out and as a result will greatly benefit from it.

Sincerely,

Jennifer De Angelis

Jennifer De Angelis

received
10/27/03
KT

October 22, 2003

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria VA 22302

Dear Sir or Madam:

I am very pleased to see a new Food Guide Pyramid. I found the old one to have a significant impact on consumers, at the same time, I found it too general. The American public has become increasingly diet conscious and increasingly overweight. Consumers are being bombarded with conflicting information regarding what is good and bad for them, a new pyramid is more important than ever.

My favorite thing about the new pyramid is the 12 subgroups describing food intake patterns based on energy levels. It appears that it will work in harmony with diabetic plans and I believe that will be a real asset in the future. I felt that it would be very useful to professionals in education because it stresses that caloric intake is based on things like age, energy level and gender. No one plan could encompass all demographics and this plan can be adapted to fit any of them.

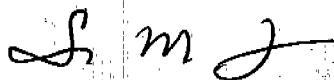
I also liked division of food groups into more specific subgroups such as starchy vegetables and whole grains. The use of the word additional regarding fats will also be helpful in reminding people that many foods already contain the fats we require in our diets. I agree with the use of sedentary reference sized individuals as long as it is made clear in consumer literature that different energy levels require different eating patterns.

The previous pyramid did work in one way. It was simple. I strongly feel for that reason that "serving" should remain as the descriptive for amounts. I would like to see serving size conversions as a separate educational tool. I agreed with the idea that conversions within a particular food group would be confusing. If this was treated as supplemental to the pyramid I believe it would have more impact.

I strongly feel that it would be important to develop specific target audience material. I was taught the pyramid as a child and my diet choices were impacted by it. Children are the most important target group, as they are the most impressionable group. This demographic is in need of education and prevention rather than maintenance or improvement.

I think the new pyramid is more complex than its predecessor, but necessarily so. I am eager to see it "boiled down" and brought to the consumer.

Sincerely,



Suzanne M. Furgal
Nursing Student, Curry College

USDA
Center for Nutrition
Policy and Promotion

received
10/27/03

KT

October 17, 2003

3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

To Whom It May Concern,

I support the new food pyramid because it seems to be a healthier way of eating and is based on years of research. I think that daily exercise and weight control should be on the bottom of the pyramid because it is a big factor in being healthy. The second level of the new pyramid includes grains but also plant oils which is a newly found nutritional food and also peanuts which are found with a different nutritional value than other nuts. Meats are also in this category which were considered bad before but now have been shown to be good in moderation. Vegetables can be eaten in abundance and fruits have been proven to be better for us than we thought, but in moderation. Dairy is lowered to 1-2 servings, showing it is better to have in moderation as well. Alcohol was added to the new pyramid as a healthy source but only in moderation. Red meat and butter should be used sparingly which is good because they both are proven to cause a build up in cholesterol. Also at the top of the new pyramid are all white flours and rice, etc. These are all processed foods and have been stripped of their nutritional values. Many are unaware of the foods they eat that may seem good for you but are really just processed food. So it is good that we are aware of them. Pasta was put at the top of the pyramid as well because of the high carbohydrates. Sweets remain at the top, as they should be. Vitamins were added at the top as well, which is a good point because many people do not follow the food pyramid as they should and they do not get the nutrients they need each day. So vitamins can help increase our nutritional diet, but they do not come close to replacing the real nutritional foods we should be having every day.

I think it was definitely time for a new pyramid to be made. Today, people do not have the time to think about what foods they should or should not eat. It is hard to know what is good out there and this new pyramid has the ability to show us and keep us on track. I think it is good because there was a lot of time and research put into it and it is something everyone can believe to be the best information about nutrition. The old food pyramid was not really based on research nor did it explain the reasoning and facts about the information. This new pyramid gives everyone information on what we should be eating and more importantly why we should be eating it.

Sincerely,

Marilyn Conlon
Student at Curry College

1091 Galvin

received
10/27/03
KT

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

Dear USDA,

I just looked over the revised and the old food pyramids. The idea that I was mostly interested in was on the revised food pyramid. The daily exercise and weight control, I think, is the most important part of anyone's daily routine. Obesity is one of the major problems in today's society. Good nutrition habits should start as young children. Every person has a diverse cultural heritage that could have an effect on their nutrition. I think every person should know their limits when it comes to food so they don't become too overweight because it is not healthy. People that do have best possible nutritional status are usually livelier, have fewer illnesses, and live longer than those who are malnourished. Under nutrition is also another big issue because those that have delayed wound healing, longer hospital stays and higher health care costs. Over nutrition can cause obesity and other diseases such as diabetes and heart disease. Daily exercise should be done everyday whether it's running or walking. It rejuvenates you and increases your self-esteem.

The revised food pyramid suggests that avoiding fats and eating plenty of carbohydrates is the way to go. Bread, cereal, rice and pasta all fit into this group. The positive part is that they give you energy. Carbohydrates are absorbed as sugars: monosaccharides, disaccharides and polysaccharides. Some carbohydrates can be digested and those that are not form bulk in the diet. Too much bulk can also be harmful. For instance, too many lipids aren't the best. Whole grains, vegetables, potatoes, fruits and honey are first-rate sources of carbohydrates. Too much of anything isn't good, there needs to be some variety because no one food has all essential nutrients. In the old pyramid there was one main group for carbohydrates and in the new one they are split up so each group has a taste of every other group. It's a good way to get nutrients in every meal. The number of servings is also taken into consideration especially on a diet. It is important to get plenty of nutrients because they provide energy, provide structural material for body tissues, and regulate body processes. If you're not able to get all the necessary nutrients then vitamins can be assistance; they can prevent metabolic deficits which don't help the body grow or maintain itself.

In conclusion, I agree with the revised food pyramid. It has more choices and a wide variety of foods to choose from to get all the essential nutrients one needs to eat a healthy meal. Not eating healthy is acceptable but as long as you know your limits and continue with a healthy lifestyle.

Sincerely, .

Denise Galvin

received
10/21/03
kt

October 22, 2003

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

To whom it may concern:

I am writing in regards to your new proposal of the nutrition pyramid. I feel that the change will be successful. The one main goal I find to be the most important is the carbohydrates. Yes they are good for us, but the wrong kinds of carbohydrates are bad for the body. By changing the white carbohydrates portions from 6 to 11 servings a day to *use sparingly* will not only decrease the bodies metabolism but will help to regulate the bodies sugar levels. It is known that white breads, rice, and potatoes can elevate the blood sugar levels quickly, but the down fall is that the levels will also decrease dramatically causing complications such as diabetes, heart disease, and rapid weight gain. The whole grain carbohydrates take longer for the body to digest therefore we would not need to eat as much and or as often. Our bodies would have proper time to digest and metabolize the food we give to it.

Cholesterol also produces a problem in the health field. The pyramid now states that red meat should be consumed along with poultry, fish, and beans. However red meat is an eminent factor in the cholesterol scales. If we were to replace the red meat with the poultry and fish instead of eating it alongside, cholesterol levels will diminish. Also, changing from butter to olive oil will help to decrease the chance of high cholesterol.

These are only a few of the factors which I strongly agree with. To me the whole change in servings makes sense. Having too many carbohydrates and not enough activity will only give you body fat, eating too many saturated fats are no good for the cardiac system, having enough vegetables and fruit can decrease the chance of heart attacks and strokes, eating nuts and beans provide the body with adequate protein, fiber, minerals, and vitamins. Milk from a cow or a sheep is also high in saturated fats. If you were to reduce the amount of fat to low fat milk or yogurt products you will still produce enough calcium, but not as much fats. Also, it is important to understand that we live very busy lives; we do not always have the time to sit down and eat the proper and the right amount of food or nutrients. So if we were to take daily supplements (like the Flintstone vitamin for children) we would yield the appropriate quantities of vitamins, minerals, and nutrients. I agree that the largest factor of this food pyramid should be highly emphasized; exercise and weight control must be understood world wide that with out this there would be no base to a proper diet and nutritional balance.

In closing, I would like to state that this new change of the food pyramid will benefit the lives of all people. It has been thought of and developed suitably to all who should use it. I also feel that the food pyramid should be revised and recalculated as the human needs mature and develop.

Sincerely,

Tanya Ellis
Tanya Ellis

October 20, 2003

received
10/27/03

15

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

To Whom It May Concern:

I am writing in regards to rebuilding the new pyramid. I am in favor of remodeling the food pyramid so people have a better guideline to portion their intake of foods, and also live longer, healthier lives. The old food pyramid was vague, and really not informative. Researchers have new evidence supporting which foods are good and help fight cancer whereas which foods are not good and can attribute to chronic diseases.

Nutritionists have known for years that there were mistakes in the food pyramid. For instance, the old pyramid recommends people to use fats, oils, and sweets sparingly, but intake 6-11 servings of carbohydrates founded in bread, cereal, rice, and pasta. Researchers knew for a long time that saturated fats founded in red meat, and dairy products increase cholesterol. Cholesterol can lead to bigger problems such as coronary artery disease. Poultry, and fish contains less saturated fat and fish is a good source of the essential omega-3 fatty acids. People who eat poultry, and fish instead of red meat have a lower chance of coronary artery disease.

The newer model should include the use of red meat, and butter sparingly, whereas the vegetables should be absorbed in large quantities. Most recent studies have shown that fruits and vegetables have lowered the risk of cancer, especially green leafy vegetables which have folic acid and may reduce the risk of colon cancer.

In the old model, it does not mention anything pertaining to vitamins. I think that in the new model, everyone should take a multi-vitamin once a day to supplement vitamins that people do not receive from food.

If the main goal for the food pyramid is to maintain good health, then exercise also needs to be added to the food pyramid. Exercise along with eating healthy can help a person live longer, and maintain weight control. Overall, I think that the food pyramid needs to be more detailed, because certain foods contribute to better health. More research is needed to explain the health effects of specific fruits and vegetables. Also the benefits of vitamins and risk of vitamins needs to be clarified, because people who are taking vitamins should know how much of a vitamin they should intake.

Sincerely,

Nadine D'Amelio

October 23, 2003

USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, Virginia 22302

received
10/27/03

Dear Sir or Madam:

Much research has been done regarding the eating habits of Americans. There are reports that as much as 35-45% of Americans are overweight today, including children. This contributes to the increase in a variety of illnesses, from diabetes to cardiovascular disease as well as a variety of cancers.

The new pyramid promotes exercise and a lifestyle that limits excessive calorie intake. Fats such as olive oil, canola, soy, corn, peanut and sunflower provide a major portion of the daily caloric intake, combined with whole grain foods. Vegetable and fruit portions should be eaten substantially. Protein should be eaten no more than 2 servings per day, including nuts, fish, eggs and poultry. Limited amounts of red meat, white bread, white rice, white pasta and butter are to be eaten.

A multiple vitamin is recommended daily.

Alcohol, consumed in moderation, has proven to have benefits to the cardiovascular system. In using this outline as a guide to healthy eating, women have a thirty percent lower risk of cardiovascular disease and forty percent for men. Combined with evidence of a lower risk for major chronic diseases, and there is an overall improvement of the health and welfare of the population.

It has not been proven that these dietary changes have any positive effect on cancer. Rather, the monitoring of weight, combined with physical activity are larger factors related to cancer.

A diet high in fiber offers a lower risk of type 2 diabetes and cardiovascular disease. It does not reduce the risk of colon cancer as previously thought.

Red meat, including beef, pork and lamb, raises the risk of type 2 diabetes and colon cancer. Yet poultry, fish, legumes, nuts and eggs contain more of the healthier fats, thereby lowering the risk of heart disease and colon cancer. Eggs, which can increase cholesterol levels, offer other nutritional benefits. Nuts contain omega-3 fatty acids, which lower cardiovascular and diabetes risks. Ironically, people who eat nuts are less likely to be overweight, maybe because they are found to satisfy appetites.

Dairy products have been associated with daily calcium intake. Here again, reports document that the highest fractures of bones are found where there is a high dairy diet. A high dairy diet has shown to increase men's risk of prostate cancer.

This information leads me to believe that the public needs to be better informed. The old food pyramid that has been the standard, is no longer a healthy guide for the American public. Today, it is such a huge challenge for individuals to lead a healthy lifestyle because of time constraints, stress, commitments, etc. Health insurance, medications, government assistance, Medicare and Medicaid, disability, social security, and employment have the potential to be positively affected. There are always issues about where money is being spent, and this might be one way that can prove to save money, as the general health and welfare of the public is improved.

I urge you to consider making the health of the public a priority and educate them to develop better eating habits.

Sincerely,

Debra Conkey
Debra Conkey



NORTH DAKOTA
DEPARTMENT OF HEALTH

received
10/24/03

COMMUNITY HEALTH SECTION

October 23, 2003

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive Room 1034
Alexandria VA 22302

RE: Comments of proposed daily food intake patterns

The North Dakota Healthy Weight Council is a statewide coalition of over twenty-five public and private organizations and agencies committed to promoting healthy eating and increased physical activity in North Dakota. We are pleased with the opportunity to submit on comments the Reassessment of the Food Guide Pyramid.

We recommend that the guidance surrounding fruits and vegetables should clarify that consuming more than the minimum recommended number of servings of fruits and vegetables, is better option for supporting weight maintenance than consuming more of the other food groups. Consuming more fruits and vegetable will help control "hunger" for the vast numbers of people assigned to the 1600-calorie plan.

We strongly support your inclusion of a "Milk" group in the Food Guide Pyramid. The promotion of low-fat dairy products for weight management, obesity prevention, reducing blood pressure and osteoporosis prevention has a strong scientific base. We suggest that the new Food Guide Pyramid recommend three to four servings of dairy a day. Science shows that 3-4 servings of milk, cheese and yogurt a day will not only help you meet your calcium intake, but may play an important role in weight reduction and lowering blood pressure.

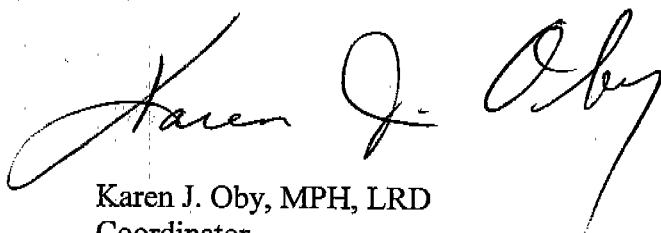
We feel that the Food Guide Pyramid should be a guide for all Americans, including those that do not use dairy products. Guidance should provide information on use of dairy foods by lactose-intolerant populations. The guidance also should provide information for those that choose not to eat dairy and other animal products. It should clearly advise appropriate choices for achieving a diet adequate in calcium and other nutrients provided by the dairy group – it is not enough just to mention that fortified soy beverages are an option.

sqj2
oby

We commend the increased emphasis on whole grains. This is an area that needs more emphasis. By increasing emphasis in the Food Guide Pyramid, more whole-grain options will be offered in supermarkets and restaurants. Think of how fast-food chains could help increase the fiber intake of this country, if they just offered a bun that was one-third whole-wheat.

CNPP mentioned in the notice that physical activity will be encouraged in the Food Guide Pyramid consumer materials. We recommend that the CNPP consider including guidance on other positive behaviors that provide for better nutrition and social interaction in our society, such as promoting family meals; eating regular meals and snacks throughout the day and turning off the TV at mealtimes. There should be a section on infant/toddler feeding that promotes breastfeeding and offers other feeding suggestions such as attention to hunger/fullness cues when feeding young infant and toddlers and the inappropriateness of using food as a reward for good behavior.

Sincerely,

A handwritten signature in cursive script that reads "Karen J. Oby". The signature is fluid and extends across the width of the text area below it.

Karen J. Oby, MPH, LRD
Coordinator
North Dakota Healthy Weight Council